

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

UNITED STATES OF AMERICA,

CR 10-

482-Ki

v.

INDICTMENT  
[UNDER SEAL]

**ARCHIE CABELLO,**  
aka Archie Cabello, Jr., Arquimedes Cabello,  
Archibaldo Cabello, Archie P. Cabello, and  
Archie Palumbo;

18 USC §§ 371;1014; 2113(b);  
2113(c);1956 (a)(1)(B)(i); 1956 (h);  
982; 2; 26 USC § 7206(1).

**MARIAN P. CABELLO,**  
aka Marian Cabello, Marian Palumbo, and  
Marian T. Palumbo; and  
**VINCENT N. CABELLO,**

UNDER  
SEAL

Defendants.

THE GRAND JURY CHARGES:

COUNT 1

[CONSPIRACY]

I. INTRODUCTION.

At various times material to this Indictment:

A. THE DEFENDANTS.

1. **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo (hereinafter referred to as **ARCHIE CABELLO**), was a resident of the state and District of Oregon from approximately September 1999, to the date of this Indictment. Since residing in Oregon, defendant **ARCHIE CABELLO** has been employed by various companies as a truck driver. Defendant **ARCHIE CABELLO**

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was employed as an armored car driver by Oregon Armored Services (OAS), 6645 North Ensign Street, Portland, Oregon, from approximately March 1, 2005, to December 6, 2005. Prior to approximately September 1999, defendant **ARCHIE CABELLO** was a resident of the state of Wisconsin. Defendant **ARCHIE CABELLO** was employed as a truck driver for various companies in Wisconsin, and as an armored car driver for Dunbar Federal Armored Express, Inc., 3642 W. Elm Street, Milwaukee, Wisconsin. Defendant **ARCHIE CABELLO** is married to defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, and as of the date of this Indictment, resides with her in Portland, Oregon. Defendant **ARCHIE CABELLO** is also the father of defendant **VINCENT N. CABELLO**.

2. Defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo (hereinafter referred to as **MARIAN P. CABELLO**) has been a resident of Portland, Oregon, from approximately September 1999 to the date of this Indictment. She resides with her husband, defendant **ARCHIE CABELLO**. She is the mother of defendant **VINCENT N. CABELLO**. Defendant **MARIAN P. CABELLO** lived and worked in the state of Wisconsin until approximately September 1999. At various times during the course of the conspiracy, defendant **MARIAN P. CABELLO** worked in the food services business, the retail business, and was a homemaker. During the course of the conspiracy, defendant **MARIAN P. CABELLO** managed the finances and paid many of the bills for the Cabello family.

3. Defendant **VINCENT N. CABELLO** has been a resident of Portland, Oregon from approximately September 1999, to the date of this Indictment. During this time period, defendant **VINCENT N. CABELLO** was employed as a security guard and as a bouncer in the Portland, Oregon metropolitan area. Prior to moving to Portland, Oregon, defendant **VINCENT**

**N. CABELLO** resided in Milwaukee, Wisconsin. Defendant **VINCENT N. CABELLO** was employed as a shipping and receiving clerk at American Security Corporation, 770 North Jefferson Street, Milwaukee, Wisconsin, from approximately April 20, 1998, to September 1999. Defendant **VINCENT N. CABELLO** is the son of defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO**.

## **II. OBJECTS OF THE CONSPIRACY.**

1. Beginning in or about August 1995, and continuing thereafter until the date of this Indictment, in the District of Oregon and elsewhere, defendants **ARCHIE CABELLO**, **MARIAN P. CABELLO**, and **VINCENT N. CABELLO**, did knowingly and intentionally combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury, to commit the following offenses, all in violation of Title 18, United States Code, Section 371, to-wit:

- (A) Bank Larceny, in violation of Title 18, United States Code, Section 2113(b);
- (B) Possession of Stolen Bank Funds, in violation of Title 18, United States Code, Section 2113(c); and
- (C) Making False Statements on Credit Applications, in violation of Title 18, United States Code, Section 1014.

## **III. MANNER AND MEANS BY WHICH THE CONSPIRACY WAS CARRIED OUT.**

Defendants **ARCHIE CABELLO**, **MARIAN P. CABELLO**, and **VINCENT N. CABELLO**, together with others both known and unknown to the grand jury acting at the defendants' direction, carried out the conspiracy through the following manners and means:

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1. It was part of the conspiracy that defendants **ARCHIE CABELLO** and **VINCENT N. CABELLO** stole funds from federally insured banks and other financial institutions. In three separate instances, they staged their thefts in a manner designed to make it appear that others persons had stolen or robbed the funds, when in fact, defendants **ARCHIE CABELLO** and **VINCENT N. CABELLO** stole the funds.

2. It was further a part of the conspiracy that defendant **ARCHIE CABELLO**, and others known and unknown to the grand jury, staged the larceny of approximately \$157,839 from the armored car defendant **ARCHIE CABELLO** was driving for Dunbar Federal Armored Express, Inc., 3642 W. Elm Street, Milwaukee, Wisconsin on or about August 5, 1995.

3. It was further part of the conspiracy that defendant **VINCENT N. CABELLO** obtained employment as a shipping and receiving clerk at American Security Corporation, 770 North Jefferson Street, Milwaukee, Wisconsin on approximately April 20, 1998.

4. It was further part of the conspiracy that defendant **VINCENT N. CABELLO**, and others known and unknown to the grand jury, staged a robbery of approximately \$730,000 from the vault at American Security Corporation on or about July 13, 1998.

5. It was further part of the conspiracy that defendants **ARCHIE CABELLO**, **MARIAN P. CABELLO**, and **VINCENT N. CABELLO** moved from Milwaukee, Wisconsin to Portland, Oregon in or about September 1999.

6. It was further part of the conspiracy that in or about March 2005, defendant **ARCHIE CABELLO** resigned from his employment as a driver with DHL in Portland, Oregon, to take a lower paying position as an armored car driver with Oregon Armored Services (OAS), 6645 North Ensign Street, Portland, Oregon.

7. It was further part of the conspiracy that defendant **ARCHIE CABELLO** and others known and unknown to the grand jury, staged a robbery of approximately \$3,000,000 from the armored car defendant **ARCHIE CABELLO** was driving for Oregon Armored Services (OAS), 6645 North Ensign Street, Portland, Oregon in Portland, Oregon on or about December 6, 2005.

8. It was further part of the conspiracy that defendant **ARCHIE CABELLO**, and others known and unknown to the grand jury, staged the robberies of Dunbar Federal Armored Express, Inc. and Oregon Armored Services, and that defendant **VINCENT N. CABELLO**, and others known and unknown to the grand jury, staged the robbery of the vault at American Security Corporation in Milwaukee, Wisconsin, so that defendants **ARCHIE CABELLO**, **MARIAN P. CABELLO**, and **VINCENT N. CABELLO** would have possession and use of large sums of stolen bank funds and other funds.

9. It was further part of the conspiracy that defendants **ARCHIE CABELLO**, **MARIAN P. CABELLO**, and **VINCENT N. CABELLO**, possessed and used the bank funds stolen over the course of the conspiracy in a manner designed to conceal the source of the funds.

10. It was further part of the conspiracy that defendants **ARCHIE CABELLO**, **MARIAN P. CABELLO**, and **VINCENT N. CABELLO** submitted credit card applications to federally insured banks and other financial institutions using aliases, false names, false income figures, false employers, and other false financial information, in order to fraudulently obtain credit and credit cards from those federally insured banks and other financial institutions.

11. It was further part of the conspiracy that once they were granted credit and received credit cards from federally insured banks and other financial institutions, defendants

**ARCHIE CABELLO, MARIAN P. CABELLO, and VINCENT N. CABELLO** used these fraudulently obtained credit cards to pay for a large portion of their living expenses.

12. It was further part of the conspiracy that defendants **ARCHIE CABELLO, MARIAN P. CABELLO, and VINCENT N. CABELLO** used bank accounts for only a few of their minor living expenses.

13. It was further part of the conspiracy that defendants **ARCHIE CABELLO, MARIAN P. CABELLO, and VINCENT N. CABELLO** used money orders that were purchased at least in part with stolen bank funds in order to pay for most of the bills generated from their use of the fraudulently obtained credit cards.

14. It was further part of the conspiracy that in addition to using fraudulently obtained credit and credit cards for personal living expenses, defendants **ARCHIE CABELLO, MARIAN P. CABELLO, and VINCENT N. CABELLO** used cash and money orders purchased at least in part with stolen bank funds in order to pay for large portions of their living expenses such as rent, utilities, and food.

15. It was further part of the conspiracy that defendants **ARCHIE CABELLO, MARIAN P. CABELLO, and VINCENT N. CABELLO** used cash and money orders to pay for their living expenses in order to make it more difficult for law enforcement officials to trace the source of the funds.

16. It was further part of the conspiracy that in March 2006, defendants **ARCHIE CABELLO and MARIAN P. CABELLO** filed a False Federal Income Tax Return for the calendar year 2005 with the Internal Revenue Service, which failed to claim as total income, the proceeds from the December 6, 2005, theft of federally insured bank funds from the Oregon

Armored Services armored car driven by defendant **ARCHIE CABELLO**. Defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO** filed the false federal income tax return for the calendar year 2005 in order to conceal the theft of federally insured bank funds from the Oregon Armored Services armored car.

17. It was further part of the conspiracy that during the calendar year 2006, defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO** made total expenditures of approximately \$56,264, including the use of cash and money orders, yet on their joint individual federal tax return for 2006, reported total income of approximately \$11,599.

18. It was further part of the conspiracy that during the calendar year 2007, defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO** made total expenditures of approximately \$87,169, including the use of cash and money orders, yet on their joint individual federal tax return for 2007, reported total income of approximately \$10,278.

19. It was further part of the conspiracy that during the calendar year 2008, defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO** made total expenditures of approximately \$58,346, including the use of cash and money orders, yet on their joint individual federal tax return for 2008, reported total income of approximately \$11,813.

20. It was further part of the conspiracy that during the calendar year 2009, defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO** made total expenditures of approximately \$43,864, including the use of cash and money orders, yet failed to report income to the Internal Revenue Service on a joint or individual income tax return for the calendar year 2009.

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#### IV. OVERT ACTS.

1. On or about May 20, 1995, defendant **ARCHIE CABELLO** began work as an armored car driver with Dunbar Federal Armored Express, Inc., 3642 W. Elm Street, Milwaukee, Wisconsin.

2. On or about August 4, 1995, defendant **ARCHIE CABELLO** worked as both a driver and a pick-up and drop-off person on Dunbar Federal Armored Express, Inc. armored car #9198 in Milwaukee, Wisconsin.

3. On or about August 4, 1995, defendant **ARCHIE CABELLO**, did take and carry away with intent to steal and purloin, approximately \$157,839 of currency belonging to Firststar Bank, 3333 S. 27<sup>th</sup> Street, Milwaukee, Wisconsin, a federally insured financial institution at the time of such taking and carrying away.

4. On or about April 20, 1998, defendant **VINCENT N. CABELLO** began employment as a shipping and receiving clerk with American Security Corporation, 770 North Jefferson Street, Milwaukee, Wisconsin.

5. On or about July 13, 1998, defendant **VINCENT N. CABELLO**, along with persons known and unknown to the grand jury, staged the robbery of approximately \$730,000 from the vault at American Security Corporation, 770 North Jefferson Street, Milwaukee, Wisconsin.

6. On or about March 15, 1999, defendant **MARIAN P. CABELLO** falsely stated on an application for a credit card from Discover Card that she had annual income of \$40,000.

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7. In or about September 1999, defendants **ARCHIE CABELLO, MARIAN P. CABELLO**, and **VINCENT N. CABELLO**, moved from Milwaukee, Wisconsin to Portland, Oregon.

8. On or about November 17, 1999, defendant **MARIAN P. CABELLO** falsely stated on an application for a credit card from Aspire Visa that she had annual income of \$45,000.

9. On or about November 29, 1999, defendants **ARCHIE CABELLO, MARIAN CABELLO**, and **VINCENT N. CABELLO**, caused the payment of U.S. Bank money order number xxxxxxxx2168 in the amount of \$975.00 to Russell Fox.

10. On or about January 31, 2000, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from Chase Bank that he had total household income of \$65,000.

11. On or about July 22, 2000, defendant **VINCENT N. CABELLO** falsely stated on an application for a credit card from Discover Card Services that he had total household income of \$53,000.

12. On or about September 10, 2001, defendants **ARCHIE CABELLO, MARIAN CABELLO**, and **VINCENT N. CABELLO**, caused the payment of Western Union money order number xx-xxxxxx3505 in the amount of \$284.45 to Bank of America.

13. On or about November 5, 2001, defendants **ARCHIE CABELLO, MARIAN CABELLO**, and **VINCENT N. CABELLO**, caused the payment of Western Union money order number xx-xxxxxx8509 in the amount of \$400.00 to Citibank.

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14. On or about November 26, 2001, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx3178 in the amount of \$200.00 to credit card company Capital One.

15. On or about December 3, 2001, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx4283 in the amount of \$500.00 to "Mr. Fox", and the payment of Western Union money order number xx-xxxxx4284 in the amount of \$475.00 to "Mr. Fox".

16. On or about May 5, 2002, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx1075 in the amount of \$500.00 to AT &T, and the payment of Western Union money order number xx-xxxxx4376 in the amount of \$500.00 to AT & T Universal.

17. On or about May 22, 2002, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from Bank of America that he had yearly income of \$60,000.

18. On or about August 5, 2002, defendant **MARIAN P. CABELLO** falsely stated on an application for a credit card from Chase Bank that she had gross household income of \$75,000.

19. On or about October 29, 2002, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx1966 in the amount of \$500.00, and Western Union money order number xx-xxxxx1967 in the amount of \$195.00 for defendant **VINCENT N. CABELLO'S** rent.

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20. On or about January 24, 2003, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx4446 in the amount of \$500.00 to Bank of America.

21. On or about March 26, 2003, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx0997 in the amount of \$500.00 to Bank of America.

22. On or about June 13, 2003, defendant **MARIAN P. CABELLO** falsely stated on an application for a credit card from Juniper Bank that she had yearly income of \$90,000.

23. On or about October 1, 2003, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx4253 in the amount of \$500.00 for Anthony Cabello's rent, and the payment of Western Union money order number xx-xxxxx4254 in the amount of \$195.00 for Anthony's Cabello's rent.

24. On or about November 15, 2003, defendant **MARIAN P. CABELLO,** using the name Marian T. Palumbo, falsely stated on an application for a credit card from Bank of America that she had yearly income of \$80,000.

25. On or about December 15, 2003, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx8221 in the amount of \$500.00 to United Cardmember Services.

26. On or about February 23, 2004, defendants **ARCHIE CABELLO, MARIAN CABELLO,** and **VINCENT N. CABELLO,** caused the payment of Western Union money order number xx-xxxxx4329 in the amount of \$200.00 to MBNA.

27. On or about August 3, 2004, defendant **MARIAN P. CABELLO**, using the name Marian Cabello, falsely stated on an application for a credit card from Citibank that she had yearly income of \$80,000.

28. On or about September 13, 2004, defendants **ARCHIE CABELLO, MARIAN CABELLO, and VINCENT N. CABELLO**, caused the payment of Western Union money order number xx-xxxxxx3175 in the amount of \$500.00 to Fleet Credit Card.

29. On or about August 20, 2004, defendant **VINCENT N. CABELLO** falsely stated on an application for a credit card from American Express that he had yearly income of \$100,000.

30. On or about November 30, 2004, defendants **ARCHIE CABELLO, MARIAN CABELLO, and VINCENT N. CABELLO**, caused the payment of Western Union money order number xx-xxxxxx5519 in the amount of \$500.00 to Fleet Credit Card, and the payment of Western Union money order number xxxxxxxx4927 in the amount of \$500.00 to Fleet Credit Card.

31. On or about April 3, 2005, defendants **ARCHIE CABELLO, MARIAN CABELLO, and VINCENT N. CABELLO**, caused the payment of Western Union money order number xx-xxxxxx7841 in the amount of \$500.00 for Anthony Cabello's rent, and the payment of Western Union money order number xx-xxxxxx7843 in the amount of \$195.00 for Anthony Cabello's rent.

32. On or about April 24, 2005, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from Discover Card that he had total household income of \$85,000.

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33. On or about May 1, 2005, defendants **ARCHIE CABELLO, MARIAN CABELLO**, and **VINCENT N. CABELLO**, caused the purchase of Travelers Express Company, Inc. money order number xxxxxxxx7724 in the amount of \$975.00.

34. On or about June 6, 2005, defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO**, using the name Theresa L. Pallela, caused the submission of an application for a credit card to Capital One Bank, which falsely stated that Theresa L. Pallela had a total annual household income of \$70,000.

35. On or about June 19, 2005, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from RBS/Citizen's Bank, N.A. that: (1) his employer was DHL; and (2) he had gross annual household income of \$70,000.

36. On or about August 1, 2005, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from RBS/Citizen's Bank, N.A. that: (1) his employer was DHL; and (2) he had gross annual household income of \$90,000.

37. On or about September 2, 2005, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from Chase Bank (formerly Washington Mutual Bank) that: (1) he owned a residence, and (2) he had annual household income of \$90,000.

38. On or about October 2, 2005, defendant **ARCHIE CABELLO** falsely stated on an application for a credit card from U.S. Bank that: (1) he owned a residence; (2) that his employer was DHL; and (3) that he had annual income of \$90,000.

39. On or about December 6, 2005, defendant **ARCHIE CABELLO** and others known and unknown to the grand jury, did take and carry away with intent to steal and purloin, approximately \$3,000,000 in United States currency belonging to and in the care, custody,

control, management and possession of U.S. Bank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC) at the time of such taking and carrying away.

40. On or about December 16, 2005, defendant **ARCHIE CABELLO** caused check number 48246 to be written on Chase Card Services account number xxxx xxxx xxxx 1688 in the amount of \$5,000, made payable to defendant **ARCHIE CABELLO**.

41. On or about December 20, 2005, defendant **ARCHIE CABELLO** caused check number 48247 to be written on Chase Card Services account number xxxx xxxx xxxx 1688 in the amount of \$5,000, made payable to Boyle, Boyle & Boyle.

42. On or about December 20, 2005, defendant **ARCHIE CABELLO** caused check number 48248 to be written on Chase Card Services account number xxxx xxxx xxxx 1688 in the amount of \$5,000, made payable to Boyle, Boyle & Boyle.

43. On or about March 6, 2006, defendants **ARCHIE CABELLO** and **MARIAN P. CABELLO** willfully made and subscribed a false joint U.S. Individual Income Tax Return, Form 1040A, for the calendar year 2005.

44. On or about August 27, 2007, defendant **VINCENT N. CABELLO** falsely stated on an application for a credit card from Citibank that he had gross yearly household income of \$100,000.

45. In or about September 2007, defendant **VINCENT N. CABELLO** falsely stated on an application for a credit card from Bank of America that he had yearly income of \$100,000.

46. On or about October 8, 2007, defendant **VINCENT N. CABELLO** falsely stated on an application for a credit card from American Express that he had yearly income of \$70,000.

47. On or about March 2, 2009, defendant **VINCENT N. CABELLO** gave \$3664 in cash and Capital One purchase check number 12839 in the amount of \$11,000 to car dealership Vic Alfonso Cadillac & Hummer, Inc. for the purchase of a 2006 Hummer automobile, VIN #5GTDN136668115391.

48. On or about October 30, 2009, defendants **ARCHIE CABELLO, MARIAN CABELLO**, and **VINCENT N. CABELLO**, caused the purchase of Western Union money order number xx-xxxxxx0955 in the amount of \$975.

49. On or about May 4, 2010, defendant **ARCHIE CABELLO** gave his attorney a partial fee of approximately \$7400 in one hundred dollar bills.

50. On or about May 13, 2010, defendant **ARCHIE CABELLO** caused his attorney to file with the Internal Revenue Service, a Form 8300, Report of Cash Payments Over \$10,000 Received in a Trade or Business, stating that the attorney's law firm had received a fee of \$14,800 from defendant **ARCHIE CABELLO**, at least \$7400 of which was cash.

All in violation of Title 18, United States Code, Section 371.

## **COUNT 2**

### **[BANK LARCENY]**

On or about December 6, 2005, in the District of Oregon, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, and others known and unknown to the grand jury, did take and carry away with intent to steal and purloin, approximately \$3,000,000 in United States currency belonging to and in the care, custody, control, management and possession of U.S. Bank, a

financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC) at the time of such taking and carrying away.

All in violation of Title 18, United States Code, Section 2113(b).

### **COUNT 3**

#### **[POSSESSION OF STOLEN BANK FUNDS]**

Between on or about December 6, 2005, and the date of this Indictment, in the District of Oregon, defendants **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo; **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo; and **VINCENT N. CABELLO**, and others known and unknown to the grand jury, did possess, conceal, and dispose of approximately \$3,000,000 in United States currency, which had been taken and carried away with intent to steal and purloin from the care, custody, control, management, and possession of U.S. Bank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC) at the time of such taking and carrying away, knowing that said money had been stolen.

All in violation of Title 18, United States Code, Sections 2113(c) and 2.

### **COUNT 4**

#### **[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about May 22, 2002, in the District of Oregon, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, knowingly made material false statements for the purpose of influencing the actions of Bank of America, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the



defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, falsely stated on the application for a credit card that: (1) he owned a residence, and (2) he had annual salary of \$60,000, when in truth and in fact defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo then and there well knew that: (1) he did not own a residence, and (2) he did not have annual salary in the amount of \$60,000.

All in violation of Title 18, United States Code, Section 1014.

### **COUNT 5**

#### **[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about August 5, 2002, in the District of Oregon, defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, knowingly made material false statements for the purpose of influencing the actions of Chase Bank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo; falsely stated on the application for a credit card that she had gross household income of \$75,000, when in truth and in fact defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, then and there well knew that she did not have gross household income in the amount of \$75,000.

All in violation of Title 18, United States Code, Section 1014.

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## COUNT 6

### [FALSE STATEMENT ON CREDIT APPLICATION]

On or about June 13, 2003, in the District of Oregon, defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, knowingly made material false statements for the purpose of influencing the actions of Juniper Bank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, falsely stated on the application for a credit card that she had yearly income of \$90,000, when in truth and in fact defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, then and there well knew that she did not have yearly income in the amount of \$90,000.

All in violation of Title 18, United States Code, Section 1014.

## COUNT 7

### [FALSE STATEMENT ON CREDIT APPLICATION]

On or about November 15, 2003, in the District of Oregon, defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, knowingly made material false statements for the purpose of influencing the actions of Bank of America, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, falsely stated on the application for a credit card that she had yearly household income of \$80,000, when in truth and in fact defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian

T. Palumbo, then and there well knew that she did not have yearly household income in the amount of \$80,000.

All in violation of Title 18, United States Code, Section 1014.

#### **COUNT 8**

##### **[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about August 3, 2004, in the District of Oregon, defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, knowingly made material false statements for the purpose of influencing the actions of Citibank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, falsely stated on the application for a credit card that she had yearly income of \$80,000, when in truth and in fact defendant **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, then and there well knew that she did not have yearly income in the amount of \$80,000.

All in violation of Title 18, United States Code, Section 1014.

#### **COUNT 9**

##### **[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about June 19, 2005, in the District of Oregon, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, knowingly made material false statements for the purpose of influencing the actions of RBS/Citizen's Bank, N.A., a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that

the defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, falsely stated on the application for a credit card that: (1) his employer was DHL; and (2) he had gross annual household income of \$70,000, when in truth and in fact defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, then and there well knew that: (1) his employer was not DHL; and (2) he did not have gross annual household income of \$70,000.

All in violation of Title 18, United States Code, Section 1014.

#### **COUNT 10**

#### **[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about August 1, 2005, in the District of Oregon, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, knowingly made material false statements for the purpose of influencing the actions of RBS/Citizen's Bank, N.A., a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, falsely stated on the application for a credit card that: (1) his employer was DHL; and (2) he had gross annual household income of \$90,000, when in truth and in fact defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, then and there well knew  
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that: (1) his employer was not DHL; and (2) he did not have gross annual household income of \$90,000.

All in violation of Title 18, United States Code, Section 1014.

**COUNT 11**

**[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about September 2, 2005, in the District of Oregon, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, knowingly made material false statements for the purpose of influencing the actions of Chase Bank (formerly Washington Mutual Bank), a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, falsely stated on the application for a credit card that: (1) he owned a residence, and (2) he had annual household income of \$90,000, when in truth and in fact defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo then and there well knew that: (1) he did not own a residence, and (2) he did not have annual household income in the amount of \$90,000.

All in violation of Title 18, United States Code, Section 1014.

**COUNT 12**

**[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about October 2, 2005, in the District of Oregon, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie

Palumbo, knowingly made material false statements for the purpose of influencing the actions of U.S. Bank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, falsely stated on the application for a credit card that: (1) he owned a residence; (2) that his employer was DHL; and (3) that he had annual income of \$90,000, when in truth and in fact, defendant **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, then and there well knew that: (1) he did not own a residence; (2) his employer was not DHL; and (3) he did not have annual income of \$90,000.

All in violation of Title 18, United States Code, Section 1014.

### **COUNT 13**

#### **[FALSE STATEMENT ON CREDIT APPLICATION]**

On or about August 27, 2007, in the District of Oregon, defendant **VINCENT N. CABELLO** knowingly made material false statements for the purpose of influencing the actions of Citibank, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **VINCENT N. CABELLO** falsely stated on the application for a credit card that he had gross yearly household income of \$100,000, when in truth and in fact defendant **VINCENT N. CABELLO** then and there well knew that he did not have gross yearly household income in the amount of \$100,000.

All in violation of Title 18, United States Code, Section 1014.

#### **COUNT 14**

##### **[FALSE STATEMENT ON CREDIT APPLICATION]**

In or about September 2007, in the District of Oregon, defendant **VINCENT N. CABELLO** knowingly made material false statements for the purpose of influencing the actions of Bank of America, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), in connection with an application for a credit card in that the defendant **VINCENT N. CABELLO** falsely stated on the application for a credit card that he had yearly income of \$100,000, when in truth and in fact, defendant **VINCENT N. CABELLO** then and there well knew that he did not have yearly income in the amount of \$100,000.

All in violation of Title 18, United States Code, Section 1014.

#### **COUNT 15**

##### **[MAKING AND SUBSCRIBING A FALSE INCOME TAX RETURN] [AIDING AND ABETTING]**

On or about March 6, 2006, in the District of Oregon, defendants **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, and **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, residents of Portland, Oregon, did willfully make and subscribe, and did willfully aid, abet, assist, and cause to be so made and subscribed, a joint U.S. Individual Income Tax Return, Form 1040A, for the calendar year 2005, which was verified by a written declaration that it was made under the penalties of perjury and which they did not believe to be true and correct as to every material matter. That 2005 joint U.S. Individual Income Tax Return, Form 1040A, which was filed with the Internal Revenue Service, stated that for the calendar year 2005, **ARCHIE**

**CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, and **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, jointly earned total income from all sources reportable on Form 1040A, line 15 of \$ 32,561; whereas, as defendants **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo, and **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo, then and there well knew and believed, for calendar year 2005, they jointly earned total income reportable on Form 1040A, line 15 of a material amount greater than \$32,561.

All in violation of Title 26, United States Code, Section 7206(1), and Title 18, United States Code, Section 2.

#### **COUNTS 16 TO 50**

#### **[FINANCIAL TRANSACTIONS CONCEALING THE PROCEEDS OF CRIME]**

1. The grand jury realleges each and every allegation contained in Counts 1 through 3 of this indictment, and incorporates them as if fully set forth herein.
2. On or about the dates set forth below, in the District of Oregon, defendants **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo; **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo; and **VINCENT N. CABELLO**, with respect to each count set forth below, together with other persons known and unknown to the grand jury, did knowingly conduct financial transactions which they knew involved the proceeds of specified unlawful activities, namely the bank larceny and possession of stolen bank funds set forth in Counts 2 and 3



described above, by using the stolen bank funds to purchase money orders, and then subsequently using the money orders to pay for both personal living expenses and credit card bills generated from the use of the fraudulently obtained credit cards, each such transaction being a separate count of this indictment, as specified below. The purpose of these transactions was to conceal and disguise the nature, source, ownership, and control of the proceeds of those crimes, as more fully set forth in Counts 1 through 3.

COUNT	DEFENDANT	DATE	DESCRIPTION OF FINANCIAL TRANSACTION
16	ARCHIE CABELLO	01/08/2006	Payment of Western Union money order xx-xxxxx0666 in the amount of \$314.00 to Chase Card Services.
17	MARIAN P. CABELLO ARCHIE CABELLO	7/20/2006	Payment of National Express money order xxxxxx8948 in the amount of \$100.00 to Chase Card Services.
18	VINCENT N. CABELLO	08/29/2006	Payment of Western Union money order xx-xxxxx1557 in the amount of \$300.00 to Capital One
19	MARIAN P. CABELLO ARCHIE CABELLO	09/14/2006	Payment of Western Union money order xx-xxxxx2411 in the amount of \$100.00 to Chase Card Services.
20	ARCHIE CABELLO	12/13/2006	Payment of Money Gram money order xxxxxxx4302 in the amount of \$720.00 to Chase Card Services.
21	MARIAN CABELLO ARCHIE CABELLO	12/13/2006	Payment of National Express money order xxxxxx2198 in the amount of \$200.00 to Chase Card Services.
22	VINCENT N. CABELLO	01/02/2007	Payment of Western Union money order xx-xxxxx5871 in the amount of \$300.00 to Capital One.

23	MARIAN CABELLO ARCHIE CABELLO	02/06/2007	Payment of Western Union money order xx-xxxxx8282 in the amount of \$200.00 to Juniper Bank.
24	VINCENT N. CABELLO	03/07/2007	Payment of Western Union money order xx-xxxxx6124 in the amount of \$300.00 to Capital One.
25	MARIAN P. CABELLO ARCHIE CABELLO	04/03/2007	Payment of Western Union money order xx-xxxxx7636 in the amount of \$434.55 to Card Services.
26	VINCENT N. CABELLO	04/30/2007	Payment of Western Union money order xx-xxxxx8346 in the amount of \$300.00 to Capital One.
27	VINCENT N. CABELLO	06/06/2007	Payment of Western Union money order xx-xxxxx2044 in the amount of \$300.00 to Capital One.
28	ARCHIE CABELLO	07/16/2007	Payment of MoneyGram money order xxxxxxxxxx8609 in the amount of \$800.00 to Union Plus Credit Card.
29	ARCHIE CABELLO	08/11/2007	Payment of MoneyGram money order xxxxxxxxxx3509 in the amount of \$800.00 to Union Credit Card..
30	ARCHIE CABELLO	09/13/2007	Payment of MoneyGram money order xxxxxxxx8225 in the amount of \$500.00 to Union Credit Card..
31	MARIAN P. CABELLO ARCHIE CABELLO	11/02/2007	Payment of Western Union money order xx-xxxxx4323 in the amount of \$750.00 to Card Services.
32	MARIAN P. CABELLO ARCHIE CABELLO	01/30/2008	Payment of MoneyGram money order xxxxxxxx9499 in the amount of \$500.00 to Card Member Services.
33	MARIAN P. CABELLO ARCHIE	02/27/2008	Payment of Western Union money order xx-xxxxx0094 in the amount of \$161.42 to Chase Card Services.

	<b>CABELLO</b>		
<b>34</b>	<b>MARIAN P. CABELLO ARCHIE CABELLO</b>	03/19/2008	Payment of MoneyGram money order xxxxxxxxx7800 in the amount of \$900.00 to Chase Card Services.
<b>35</b>	<b>VINCENT N. CABELLO</b>	03/30/2008	Payment of Western Union money order xx-xxxxx6479 in the amount of \$300.00 to Chase.
<b>36</b>	<b>MARIAN P. CABELLO ARCHIE CABELLO</b>	04/12/2008	Payment of MoneyGram money order xxxxxxxxx7927 in the amount of \$900.00 to Chase Card Services.
<b>37</b>	<b>VINCENT N. CABELLO</b>	05/03/2008	Payment of Western Union money order xx-xxxxx2140 in the amount of \$300.00 to Chase.
<b>38</b>	<b>ARCHIE CABELLO</b>	05/07/2008	Payment of Western Union money order xx-xxxxx2303 in the amount of \$229.50 to Chase Card Services.
<b>39</b>	<b>ARCHIE CABELLO</b>	06/06/2008	Payment of Western Union money order xx-xxxxx8395 in the amount of \$329.00 to Chase Card Services.
<b>40</b>	<b>VINCENT N. CABELLO</b>	03/02/2009	Payment of \$3664 in cash to Vic Alfonso Cadillac & Hummer, Inc. towards the purchase of a 2006 Hummer automobile, VIN #5GTDN136668115391.
<b>41</b>	<b>VINCENT N. CABELLO</b>	07/13/2009	Payment of Western Union money order xx-xxxxx4260 in the amount of \$800.00 to Capital One.
<b>42</b>	<b>ARCHIE CABELLO</b>	07/14/2009	Payment of Western Union money order xx-xxxxx8852 in the amount of \$429.25 to U.S. Bank.
<b>43</b>	<b>ARCHIE CABELLO</b>	08/17/2009	Payment of Western Union money order xx-xxxxx5542 in the amount of \$500.00 to U.S. Bank.
<b>44</b>	<b>MARIAN P. CABELLO ARCHIE</b>	08/31/2009	Payment of Western Union money order xx-xxxxx1963 in the amount of \$100.00 to Citi Cards.

	<b>CABELLO</b>		
<b>45</b>	<b>MARIAN P. CABELLO ARCHIE CABELLO</b>	09/28/2009	Payment of Western Union money order xx-xxxxx1096 in the amount of \$100.00 to Citi Cards.
<b>46</b>	<b>VINCENT N. CABELLO</b>	01/09/2010	Payment of MoneyGram money order xxxxxxxx5170 in the amount of \$300.00 to Citi.
<b>47</b>	<b>MARIAN P. CABELLO ARCHIE CABELLO</b>	01/14/2010	Payment of National Express money order xxxxxx8453 in the amount of \$114.12 to Chase Card Services.
<b>48</b>	<b>VINCENT N. CABELLO</b>	02/22/2010	Payment of Western Union money order xx-xxxxx3377 in the amount of \$500.00 to Citi Bank.
<b>49</b>	<b>VINCENT N. CABELLO</b>	04/12/2010	Payment of Western Union money order xx-xxxxx2191 in the amount of \$300.00 to Capital One.
<b>50</b>	<b>ARCHIE CABELLO</b>	05/04/2010	Payment of cash in the amount of \$7400 to Boyle, Boyle & Boyle.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

### **COUNT 51**

#### **[MONEY LAUNDERING CONSPIRACY]**

1. The grand jury re-alleges each and every allegation contained in the Introduction and in all the paragraphs in Counts 1 through 50 of this Indictment and incorporates them by reference as if fully set forth herein.

2. From in or about August 1995, and continuing until the date of this Indictment, in the District of Oregon and elsewhere, defendants **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo; **MARIAN P.**

**CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo; and **VINCENT N.**

**CABELLO**, together with others known and unknown to the Grand Jury, did knowingly and unlawfully combine, conspire, confederate and agree with each other and with others known and unknown to the grand jury, to knowingly conduct financial transactions which they knew involved the proceeds of specified unlawful activities, namely the bank larceny and possession of stolen bank funds set forth in Counts 2 and 3 of this Indictment more fully described above.

All in violation of Title 18, United States Code, Section 1956 (h).

### **FORFEITURE ALLEGATIONS**

1. The allegations of Count 1, Counts 4 through 14, and Counts 16 through 51 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures, pursuant to Title 18, United States Code, Section 982.

2. As the result of committing any one or more of the foregoing offenses set forth in Count 1, Counts 4 through 14, and Counts 16 through 51 of this Indictment, defendants **ARCHIE CABELLO**, aka Archie Cabello, Jr., Arquimedes Cabello, Archibaldo Cabello, Archie P. Cabello, and Archie Palumbo; **MARIAN P. CABELLO**, aka Marian Cabello, Marian Palumbo, and Marian T. Palumbo; and **VINCENT N. CABELLO**, shall forfeit all property, real and personal, involved in those offenses, and all property traceable to such property, including but not limited to:

- a. Currency in the amount of \$3,000,000;
- b. A 2006 Hummer automobile, VIN #5GTDN136668115391.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

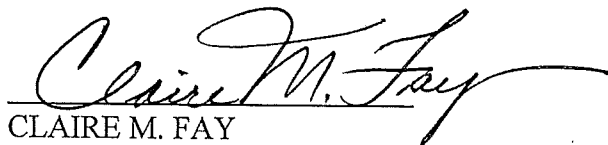
DATED this 2nd day of December, 2010.

A TRUE BILL.



FOREPERSON

Presented by:  
DWIGHT C. HOLTON  
United States Attorney  
District of Oregon



CLAIRE M. FAY  
Assistant United States Attorney